

1 **DAVID G. BANES, ESQ.**
2 **O'Connor Berman Dotts & Banes**
3 **Second Floor, Marianas Business Plaza**
4 **P.O. Box 501969**
5 **Saipan, MP 96950-1969**
6 **Telephone No. (670) 234-5684**
7 **Facsimile No. (670) 234-5683**

8 *Attorneys for Plaintiff Hye Lin Shin*

9
10 **IN THE UNITED STATES DISTRICT COURT**
11 **FOR THE NORTHERN MARIANA ISLANDS**

12 HYE LIN SHIN,)	CIVIL ACTION NO.: 08-0022
13)	
14 Plaintiff,)	PLAINTIFF'S PROPOSED
15 v.)	STATEMENT PURSUANT TO
16)	F.R.C.P. 26(f) and LR 16.2CJ.e.2
17 YOU RIM CORPORATION,)	
18)	Case Management Conference
19 Defendant.)	Date: June 10, 2008
20)	Time: 8:30 a.m.

21 The respective counsel for Plaintiff Hye Lin Shin and Defendant You Rim Corporation
22 have conferred pursuant to F.R.C.P.26(f) and LR 16.2CJ.e.2. However, due to time constraints,
23 Plaintiff files this Proposed Statement on her own.

24 The Plaintiff makes the following statement pursuant to its obligation under F.R.C.P.
25 26(f) to report on their Rule 26(f) meeting, and also pursuant to its obligation under LR
26 16.2CJ.e.2 to file a Case Management Conference Statement:

27 1. **DISCLOSURES:** The Plaintiff is conducting disclosures pursuant to
28 F.R.C.P. 26.

29 2. **TIMING AND SEQUENCE OF DISCOVERY:** The Plaintiff proposes the following
discovery schedule:

- a. Trial to commence 12 months from the Case Management Conference;
- b. Phased discovery with “fact” discovery first, and then “expert” discovery second;
- c. 6 months for fact discovery;
- d. a deadline of 2 weeks after the close of fact discovery to file any fact discovery motions, and to designate experts and produce experts’ reports pursuant to F.R.C.P. 26(a)(2);
- e. from the fact discovery motions filing deadline, 2 months for expert discovery; and
- f. a deadline of 2 weeks after the close of expert discovery to file any expert discovery motions (this brings the case to a total of 9 months from the November 30, 2005 Case Management Conference).

3. **ORDERS THAT SHOULD BE ENTERED BY THE COURT PURSUANT TO F.R.C.P.**

26(c) or 16(b) or (c): Regarding F.R.C.P. 26(c), the Plaintiff does not anticipate at this time any need for protective orders. Regarding F.R.C.P. 16(c), the Plaintiff agrees that the Local Rules’ pre-trial procedures should be followed. Regarding F.R.C.P. 16(b), LR 16.2CJ.e.2 and the topics set for discussion at the Case Management Conference pursuant to the Court’s May 19, 2008 Order re Case Management Conference, the parties state as follows:

- a. Service of process on parties not yet served. Not applicable.
- b. Jurisdiction and venue. Not applicable.
- c. Track assignment. The Plaintiff asserts that this case is generally appropriate for the Expedited Track, subject to the discovery schedule proposed, above.
- d. Anticipated motions. The Defendants may file dispositive motions.

- e. Anticipated or remaining discovery, including limitations on discovery.
Please refer to the proposed discovery schedule set forth above. All parties anticipate the use of experts.
- f. Further proceedings and scheduling of dates. The Plaintiff has no comments here other than what is discussed above or below in this statement.
- g. Appropriateness of special procedures. Not applicable.
- h. Modification of standard pre-trial procedures. The Plaintiff agrees that the standard pre-trial procedures under the Local Rules are appropriate in this case.
- i. Settlement prospects. Plaintiff is open to any reasonable settlement.
- j. Any other matter conducive to the just, efficient resolution of the case.
Not applicable.
- k. Setting of date for:
 1. Joinder of all parties. 120 days.
 2. Motions to amend. 120 days.
 3. Discovery cut-off. 6 months for fact discovery, then 2 weeks for motions regarding fact discovery, then 2 months for expert discovery and then 2 weeks for motions regarding expert discovery, as discussed above.
 4. Status conferences. As requested by the parties or set by the Court.
 5. Discovery motions hearing date. Pursuant to the Local Rules and the fact and expert discovery motions cut-off dates as discussed above.
 6. Dispositive motions filing cut-off. 60 days before trial.

7. Dispositive motions hearing date. Pursuant to the Local Rules and the dispositive motions filing cut-off.
8. Settlement conference. As requested by the parties or set by the Court.
9. Joint pre-trial order. 14 days before trial.
10. Final pre-trial conference. 7 days before the trial.
11. Trial. 12 months from the Case Management Conference, and estimated to last approximately 4-5 days.

Respectfully submitted this 9th day of June, 2008.

O'CONNOR BERMAN DOTTS & BANES
Attorneys for Plaintiff Hye Lin Sin

/s/
DAVID G. BANES, Esq.
CNMI Bar ID No. F0171

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